

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 0:23-CV-81150-ROSENBURG

ANDREW TATE & TRISTAN TATE,

Plaintiffs

vs.

JANE DOE, et al.,

Defendants.

**SECOND DECLARATION OF SERGEANT LIAM DOE
IN SUPPORT OF DEFENDANTS' RESPONSE IN OPPOSITION
TO PLAINTIFFS' MOTION FOR REMAND**

I, Liam Doe, do hereby state as follows:

1. I have reviewed the powerpoint presentation that is filing number 31-10 in this action.
2. That presentation is not the Combatting Trafficking in Persons training that I am mandated to take regularly as a Marine Reserve. It is a different presentation that is designed for all Department of Defense (DoD) Personnel.
3. Although it was not mandatory for me, I have also taken the general DoD training on a voluntary basis, and I am therefore familiar with its content.
4. The general DoD training emphasizes the importance of reporting suspected trafficking in persons.
5. The general DoD training indicates that a service member's Chain of Command is an appropriate option for reporting suspected trafficking in persons.

6. Page 5 of the general DoD training indicates that the “pornography industry” is a place where victims of sex trafficking can often be found. One of the reasons I was alarmed by the messages I was receiving from Jane Doe was the indication that multiple girls were together in a coercive environment participating in sexually explicit web-camera performances. This concerned me because it was consistent with my training that trafficking in persons may be occurring.

7. I have reviewed the whatsapp messages that appear on pages 43 through 50 of document number 31-4 in this case. Throughout these communications with Jane Doe, I repeatedly encourage her to seek the protective custody of the United States Embassy.

8. On page 44 of document 31-4, in the message with the time stamp 4/11/2022 4:23:42 AM, I inform Jane Doe that if needed I am aware of some options to protect her safety, including friends of mine in a foreign military. I did not ultimately communicate with these friends concerning her situation. I communicated my concerns for Jane Doe’s safety to my superior officer, to Jane Doe’s parents, and to the Marine Security Detail at the United States Embassy.

Executed this 20th day of September, 2023 at Palm Beach, Florida.

/s/ Liam Doe
Liam Doe